

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI**

KAREN M. DONNELLY,

Plaintiff,

v.

COLLECTION BUREAU OF AMERICA,
LTD.,

Defendant.

Case No.: 16-cv-542-CEJ

**DEFENDANT COLLECTION BUREAU OF AMERICA LTD.'S SECOND MOTION
FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE RESPOND TO
PLAINTIFF'S PETITION**

COMES NOW Defendant Collection Bureau of America LTD. ("Defendant"), by and through their counsel of record, Kutak Rock LLP, and moves the Court for an extension of an additional fourteen (14) days, up to and including May 16, 2016, within which Defendant may answer or otherwise respond to Plaintiff's Petition. In support of its motion, Defendant states:

1. Defendant seeks an additional fourteen (14) days, up to and including May 16, 2016, within which it may answer or otherwise respond to Plaintiff's Petition.
2. The requested additional extension of time is necessary to permit Defendant and its counsel adequate time to review the allegations of the Petition, gather and review information necessary to respond to the Petition, and to identify and develop Defendant's defense to the Petition.
3. No party will be prejudiced or unduly burdened by the granting of this request.
4. Plaintiff's counsel has consented to the extension.

WHEREFORE, Defendant respectfully requests the Court enter an order granting an extension of time of an additional fourteen (14) additional days for Defendant to file an answer or to otherwise plead in response to Plaintiff's Petition, up to and including, May 16, 2016.

Dated: May 2, 2016.

By: /s/ M. Courtney Koger
M. Courtney Koger Bar Number: 42343
Attorney for Defendant
Kutak Rock LLP
Suite 800
2300 Main Street
Kansas City, MO 64108
(816) 960-0090 (Telephone)
(816) 960-0041 (Facsimile)
Courtney.Koger@KutakRock.com

CERTIFICATE OF SERVICE

I hereby certify that on May 2, 2016, I presented the foregoing to the clerk of the court for filing and uploading to the CM/ECF system which will send a notice of electronic filing to the following:

Thomas R. Applewhite
Steven A. Donner
1108 Olive Street, Suite 200
St. Louis, MO 63101
tom.applewhite@da-lawfirm.com
steve.donner@da-lawfirm.com
ATTORNEYS FOR PLAINTIFF

/s/ M. Courtney Koger
M. Courtney Koger Bar Number: 42343